

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Market Dominant Product Prices
First-Class and Standard Mail
Discover Financial Services

Docket No. MC2011-19

Market Dominant Product Prices
Discover Financial Services (MC2011-19)
Negotiated Service Agreement

Docket No. R2011-3

Motion for Leave to Reply to the Postal Service's Ad Hoc Response

(April 16, 2013)

On April 11, 2013, the Postal Service filed a response to the comments of Valpak and the Public Representative in this docket.¹ Its Response is *ad hoc*, since Order Nos. 1676 or 1684 made no provision for reply comments. The Response introduces new facts that have an important bearing on the Commission's evaluation of the amended NSA. They also introduce enough confusion into the analysis of this NSA, and Market Dominant NSAs generally, that they warrant a reply. The Public Representative respectfully asks for leave to file a reply to the Postal Service's Response.

Respectfully submitted

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Public Representative

¹ Response of the United States Postal Service to Public Representative's and Valpak's Comments, April 11, 2013 (Postal Service Response). .

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